

1 Mark S. O'Connor (011029) – mark.oconnor@beusgilbert.com
2 Beus Gilbert McGroder PLLC
3 701 N. 44th Street
4 Phoenix, Arizona 85008
5 480-429-3019

6 *Co-Lead and Liaison Counsel to*
7 *Common Benefit Fee and Cost Committee*

8 Howard Nations – nations@howardnations.com
9 (TX 14823000; admitted *pro hac vice*)
10 Howard Nations Law
11 9703 Richmond, Suite 200
12 Houston, Texas 77042
13 713-807-8400
14 *Co-Chair Common Benefit Fee and Cost Committee*

15 Wendy Fleishman – wfleishman@lhcb.com
16 (NY 2500429; admitted *pro hac vice*)
17 Lieff Cabraser Heimann & Bernstein
18 250 Hudson Street, 8th Floor
19 New York, NY 10013
20 212-355-9500
21 *Co-Chair Common Benefit Fee and Cost Committee*

22 UNITED STATES DISTRICT COURT

23 DISTRICT OF ARIZONA

24 In Re Bard IVC Filters Products
25 Liability Litigation

26 No. MD-15-02641-PHX-DGC

27 **MOTION TO FILE UNDER SEAL**

28 **(Filed *Ex Parte*)**

29 Plaintiffs' Co-Lead Counsel and Liaison Counsel to the Common Benefit Fee and
30 Cost Committee and the Co-Chairs of the Common Benefit Fee and Cost Committee
31 respectfully move this Court, pursuant to Federal Rule of Civil Procedure 26(c)(1)(G) and
32 Local Civil Rule 5.6 for leave to file under seal Notice of Errata Concerning Proposed
33 Case Management Order No. 51 ("Notice").

34 The Notice pertains to a confidential hearing and contains confidential information
35 relevant to all fee applicants. Furthermore, as the Court is undoubtedly aware, all filings
36 related to the Common Benefit Fee and Cost Committee have been filed under seal in this
37 litigation. Accordingly, good cause exists for sealing the Proposed CMO.
38

RESPECTFULLY SUBMITTED this 21st day of October 2021.

BEUS GILBERT MCGRODER PLLC

By: /s/ Mark S. O'Connor

Mark S. O'Connor

701 N. 44th Street

Phoenix, Arizona 85008

*Co-Lead Counsel for Plaintiffs/Liaison Counsel
to the Common Benefit Fee and Cost Committee*

HOWARD NATIONS LAW

Howard Nations (TX Bar No. 14823000)

(admitted *pro hac vice*)

9703 Richmond, Suite 200

Houston, Texas 77042

713-807-8400

*Co-Chair, Common Benefit Fee and Cost
Committee*

LIEFF CABRASER HEIMANN &
BERNSTIEN

Wendy Fleishman (NY Bar No. 2500429)

(admitted *pro hac vice*)

250 Hudson Street, 8th Floor

New York, NY 10013

212-355-9500

*Co-Chair, Common Benefit Fee and Cost
Committee*

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of October 2021, I electronically transmitted the attached document to the Court.

/s/ Jessica Gallentine